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*Attorneys for Defendants Practical Flooring, Inc., Danette Bordlemay-Roybal  
a/k/a Danette Roybal; Leo Bernard Roybal, Jr., Platte River Insurance Company  
and Great American Insurance Company*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BOARD OF TRUSTEES OF THE PAINTERS AND  
FLOORCOVERERS JOINT COMMITTEE; BOARD  
OF TRUSTEES OF THE EMPLOYEE PAINTERS'  
TRUST; BOARD OF TRUSTEES OF THE  
PAINTERS, GLAZIERS AND FLOORCOVERERS  
JOINT APPRENTICESHIP AND JOURNEYMAN  
TRAINING TRUST; BOARD OF TRUSTEES OF  
THE PAINTERS, GLAZIERS AND  
FLOORCOVERERS SAFETY TRAINING TRUST  
FUND; BOARD OF TRUSTEES OF THE  
SOUTHERN NEVADA PAINTERS AND  
DECORATORS AND GLAZIERS LABOR-  
MANAGEMENT COOPERATION COMMITTEE  
TRUST; BOARD OF TRUSTEES OF THE  
SOUTHERN NEVADA GLAZIERS AND  
FABRICATORS PENSION TRUST FUND;  
PDCA/FCA INDUSTRY PROMOTION FUND;  
PAINTERS ORGANIZING FUND; BOARD OF  
TRUSTEES OF THE INTERNATIONAL  
PAINTERS AND ALLIED TRADES INDUSTRY  
PENSION FUND; BOARD OF TRUSTEES OF THE  
FINISHING TRADES INSTITUTE; PAINTERS  
AND ALLIED TRADES LABOR-MANAGEMENT  
COOPERATION INITIATIVE,

Plaintiffs,

vs.

PRACTICAL FLOORING, INC., a Nevada

Case No. 2:19-cv-00075-RFB-NJK

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANTS  
TO RESPOND TO THE COMPLAINT**

**(FIRST REQUEST)**

corporation; DANETTE BORDLEMAY-ROYBAL  
aka DANETTE ROYBAL, an individual; LEO  
BERNARD ROYBAL, JR., an individual; PLATTE  
RIVER INSURANCE COMPANY, a Wisconsin  
corporation; WESTERN SURETY COMPANY, a  
South Dakota corporation; GREAT AMERICAN  
INSURANCE COMPANY, an Ohio corporation;  
DOES I-X, inclusive; ROE ENTITIES I-X,  
inclusive,

Defendants.

IT IS HEREBY STIPULATED by the parties, by and through their undersigned counsel of  
record, that pursuant to LR IA 6.1, that Defendants Practical Flooring, Inc., Danette Bordlemay-  
Roybal a/k/a Danette Roybal, Leo Bernard Roybal, Jr., Platte River Insurance Company and Great  
American Insurance Company shall have up to and including April 15, 2019 within which to  
answer or otherwise respond to the Complaint.

Although the parties had agreed, in writing, to extend the deadline for a responsive pleading  
to be filed before the responsive pleading was due on behalf of Defendants Practical Flooring, Inc.,  
Danette Danette Bordlemay-Roybal a/k/a Danette Roybal, Leo Bernard Roybal, Jr., Platte River  
Insurance Company, the parties were unaware that LR IA 6.1(a) applied to extensions of time to  
respond to a Complaint and, therefore, did not formalize their agreement in the form of a  
Stipulation and Order. With respect to Defendant Great American Insurance Company Ms.  
Spangler was just retained on March 29, 2019 and filed a Notice of Appearance that same day.  
[Doc. 17]. The parties apologize to the Court for not submitting a Stipulation in advance of the  
responsive pleading deadline and submit that such error was excusable.

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1 Good cause exists to extend the time within which to file a responsive pleading because the  
2 parties are actively engaged in settlement negotiations to resolve this case in its entirety. The  
3 requested extension will provide the parties with the opportunity to finalize their negotiations  
4 without the added expense of responding to the Complaint.

5 Dated this 1st day of April, 2019.  
6

7 **CHRISTENSEN JAMES & MARTIN**

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9 Wesley J. Smith, Esq.

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15 *Attorneys for Plaintiffs Board of Trustees of the Painters and Floorcoverers*  
16 *Joint Committee, et al.*

17 **LAW OFFICES OF GEORLEN SPANGLER**

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25 *Attorneys for Defendants Practical Flooring, Inc., Danette Roybal,*  
26 *Leo Bernard Roybal, Jr., Platte River Insurance Company*  
27 *and Great American Insurance Company*  
28

**IT IS SO ORDERED.**

Dated this 2 day of April, 2019.

  
UNITED STATES MAGISTRATE JUDGE